

Eligibility Policy Handbook – Attachment A

May 31, 2013

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Introduction:

The content of this procedural handbook is equal to WorkSource System Policy 1019. This handbook will serve as the mechanism to implement and manage policy changes.

This handbook provides guidance to staff and partners concerning eligibility requirements for the Youth, Adult and Dislocated Worker Programs (WIA Title 1-B) and Wagner-Peyser (WIA Title III). Specific components of this handbook provide guidance and minimum requirements for local parameters and definitions to be established by WDCs as outlined in the Eligibility Policy (Policy 1019 Sec. 3.d - Local Responsibilities).

Sections 2, 3 and 4 cover program eligibility requirements for WIA Title 1-B Youth, Adults and Dislocated Workers. Specific parameters and guidance are provided in the subsequent sections under each program. Section 5 covers additional guidance that applies to multiple (not necessarily all) programs.

The [Eligibility Matrix](#) in Sec. 6 serves as a tool to review eligibility requirements for each program, including the corresponding documentation requirements.

NOTE: This handbook is available as a [Word document](#) to allow WDCs to modify and implement it in place of existing local policies. To preserve the format and readability of this PDF document, only the Word version is formatted to more clearly identify areas that need to be modified at the local level. These sections are clearly identified and highlighted in the Word version. Refer to Sec. 3.d of the Policy to see a list of local responsibilities that correspond to the sections of this handbook.

Definitions:

In addition to the definitions listed below, WDCs may choose to incorporate local definitions consistent with this policy and handbook. These additional definitions may address required local determinations (e.g. Stog Gap, Unlikely to Return, Low-Income, etc.) as outlined in Policy 1019 Sec. 3.d – Local Responsibilities), and/or these determinations can be incorporated throughout this handbook or other local policy documents.

- **Case Notes** – For the purpose of Data Element Validation (DEV), case notes refer to either paper or electronic statements by staff that identifies, at a minimum, the following: a participant's status for a specific data element, the date on which the information was obtained, and the staff who obtained the information ([TEGL 28-11, Attachment A](#)).
- **Covered Person (for Priority of Service)** – A veteran or their eligible spouse.
- **Cross- Match** – For the purpose of DEV, a cross-match requires validating staff to find detailed supporting evidence for the data element in a database ([TEGL 28-11, Attachment A](#)).
- **Data Element Validation (DEV)** – The federally mandated process by which the state annually assesses the accuracy of reported participant data (refer to Policy 1003 and [TEGL 28-11, Attachment A](#)).
- **Eligible Spouse (of a Veteran)** – The spouse of any of the following (JVA Sec. 2(a)):
 - (1) Any veteran who died of a service-connected disability;
 - (2) Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - (i) missing in action;
 - (ii) captured in line of duty by a hostile force; or
 - (iii) forcibly detained or interned in the line of duty by a foreign government or power;
 - (3) Any veteran who has a total disability resulting from a service connected disability, as evaluated by the Department of Veterans Affairs; or
 - (4) Any veteran who died while a disability, as indicated in paragraph (3) of this section, was in existence.
- **Self-Attestation** – Self-attestation (also referred to as a participant or applicant statement) occurs when a participant (applicant) states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status. The key elements for self-attestation are: (a) a participant (applicant) identifying his or her status for a permitted data element and (b) signing and dating a form attesting to this self-identification (with a disclaimer concerning the self-identification). Refer to handbook Sec. 7.
- **Sequence of Services (Tiers of Service)** – A tiered service delivery approach under the WIA Title 1-B Adult and Dislocated Worker Programs. The levels of service are core, intensive, and training, with service at one level being a prerequisite to moving to the next level. This sequence of service prerequisite is in addition to determination of need and program eligibility by staff.
- **State MIS** – For the purpose of DEV, State MIS refers to specific, detailed information that is stored in the state's information system that supports a data element ([TEGL 28-11, Attachment A](#)).

- **Veteran** – For the purpose of providing Priority of Service (using the broad definition) and Dislocated Worker eligibility, veteran means a person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2). Active service also includes full-time duty in the National Guard or a Reserve component, other than full time duty for training purposes.

References:

- Workforce Investment Act (WIA)
- 20 CFR Part 652 et al.
- Jobs for Veterans Act (JVA)
- TEGLs 22-04, 22-04 Change 1, 17-05, 10-09, 11-11 Change 2, 9-12, and 11-12
- [Policy 1003 Revision 1, Data Element Validation](#)
- [Policy 1009 Revision 1, Priority of Service for Veterans and Eligible Spouses](#)
- [Policy 1019, Eligibility Guidelines and Documentation Requirements](#)
- [Policy 3415 Revision 1, Records: Retention and Public Access](#)
- [WIN 0027 Change 2, WIA001 Report and Discontinued Use of UI Guide Screens](#)
- [WIN 0041, Address Confidentiality Program](#)

1. Alignment of Wagner-Peyser and WIA Title 1-B Services

1.1 Purpose

The underlying notion for the One-Stop system is the coordination of fully integrated programs, services and governance structures so that a job seeker has access to a seamless system of workforce investment services. This intent is accomplished through the establishment of a common tier of services (core, intensive and training) that is consistent across federally funded workforce development programs. In addition, DOL/ETA has furthered its integration efforts by establishing common performance metrics ([TEGL 17-05](#)) and developing an integrated performance reporting system (WISPR).

States and local areas are encouraged to utilize common intake, case management and job development systems in order to take full advantage of the One-Stops' potential for efficiency and effectiveness (20 CFR Background, WIA Principles, Page 49295). WIA Title 1-B programs and Wagner-Peyser are mandated to provide the same set of core services found at WIA Sec. 134(d)(2). There is a natural alignment of service delivery under Wagner-Peyser since all individuals are eligible for these services.

NOTE: Personal records of WIA registrants will be private and confidential, and will not be disclosed to the public. Refer to [Policy 3415 Rev. 1](#) and [RCW 50.13](#) for additional guidance on data privacy and security.

1.2 Core Services

The intent of WIA is to provide universal access to certain services prior to intensive or training services under WIA Title 1-B. DOL/ETA encourages the referral of Wagner-Peyser core and intensive service recipients to Title 1-B programs for intensive and/or training services when appropriate ([TEGL 11-12](#)).

Wagner-Peyser (Labor Exchange) core services can be provided to all job seekers and employers. Labor Exchange core services are available through self-services, facilitated self-help services, and staff-assisted services to ensure universal access (20 CFR 652.207(b)(2)). Although Labor Exchange services are available to all individuals, only individuals who are legally entitled to work in the U.S. can obtain employment. To ensure that individuals who apply or are referred are legally entitled to work in the U.S., SKIES and SSMS registration both require customer attestation to legal entitlement to work in the U.S.

In addition to universal access under Labor Exchange, certain core services (e.g., self-service or informational activities) can be provided universally with WIA Title 1-B funding. Individuals must be determined eligible and enrolled to receive WIA Title 1-B funded core services beyond self-service or informational activities. These services are offered under WIA Title 1-B (in addition to Wagner-Peyser) to ensure seamless service delivery in the One-Stop Center to minimize referrals and to ensure leveraging of resources between programs.

The types of services that can be provided without enrolling an individual are described at 664.140(2): “Self-service and informational activities are those core services that are made available and accessible to the general public, that are designed to inform and educate individuals about the labor market and their employment strengths, weaknesses, and the range of services appropriate to their situation, and that do not require significant staff involvement with the individual in terms of resources or time.” TEGL 17-05 clarifies that “significant staff involvement” includes staff’s assessment of a participant’s skills, education or career objectives to assist the participant in making a decision or accessing information, compared to staff providing a participant with readily available information that does not require an assessment.

NOTE: This policy covers basic eligibility requirements for Wagner-Peyser, including POS requirements for Covered Persons (using the broad definition of veteran – see Sec. 5.1). For verification of veteran status, the Wagner-Peyser program has specific requirements. For a complete overview of services for veterans (using the standard definition) under Wagner-Peyser, including verification of eligibility for these services, please refer to [Services for Veterans – 4030](#).

1.3 Intensive Services

Intensive services may be provided under both the Wagner-Peyser Act and WIA Title 1-B.

Intensive services funded under the Wagner-Peyser Act are available universally to all jobseekers and employers. All Wagner-Peyser funded services must be provided by state merit staff (20 CFR 652.215 and TEGL 11-12).

Adults and Dislocated Workers who receive services funded under WIA Title 1-B, other than core self-service or informational activities, must be registered and determined eligible. Participants receiving intensive services funded under WIA Title 1-B must be determined eligible and in need of additional assistance beyond core services in order to obtain or retain employment

NOTE: WIA youth services are not necessarily tiered. WIA Title 1-B provides employment and training services for economically disadvantaged youth. Youth establish educational and career goals and work toward them via WIA-funded activities.

1.4 Training Services

Training services are funded and provided to jobseekers under the WIA Title 1-B programs. Participants receiving training services funded under WIA Title 1-B must be registered, determined eligible and in need of additional service, beyond core and intensive, in order to obtain or retain employment (20 CFR 663.310).

NOTE: Staff determines when it is appropriate to progress Adults and Dislocated Workers to the next level of service (i.e. from core, to intensive, to training) in alignment with 20 CFR 663.220 and 310.

2. Youth Program

2.1 Youth Program Requirements

Individuals must meet the following eligibility guidelines for the Youth Program.

- U.S. citizen or otherwise legally entitled to work in the U.S.;
- Age 14 through 21;
- Selective Service Registration (males who are 18 or older and born on or after January 1, 1960), unless an exception is justified (see Sec. 5.2 for guidance on Selective Service registration).
- Low income individual (see Sec. 2.2 for guidance on exceptions); and
- Is within one or more of the following categories:

Category 1	Deficient in basic literacy skills
Category 2	School dropout
Category 3	Homeless, runaway, or foster child
Category 4	Pregnant or parenting
Category 5	Offender
Category 6	Requires additional assistance based on local definition An individual (including a youth with a disability) who requires additional assistance (e.g. serious barriers to employment) to complete an educational program, or to secure and hold employment. (WIA Sec. 101(13) and 20 CFR 664.200)

WDCs must define the sixth youth eligibility category listed above (vi) to determine what qualifies under “requires additional assistance” (Policy 1019 Sec. 3.d. - Local Responsibilities). A youth with a disability meets the “requires additional assistance” requirement and can be considered a family of one for low-income determinations (refer to Sec. 5.6.2). For an overview of eligibility criteria and documentation requirements refer to handbook Sec. 6.

2.2 Local Definition of Low Income and Exceptions to this Requirement

Utilizing the definition of low-income at WIA Sec. 101(25), WDCs make local determinations regarding income verification and what is included or excluded as income (Policy 1019 Sec. 3.d - Local Responsibilities).

WIA Sec. 129(c)(5) allows local areas to serve youth who are not low income (Policy 1019 Sec. 3.d. - Local Responsibilities), provided that the youth served are in one or more of the six categories listed above (1-6), or are one or more grade levels below the grade level appropriate to their age. Not more than 5% of participants served under the WIA Youth program in each area may be individuals who do not meet the low income criteria.

2.3 Out-of-School Youth

At least 30 percent of the local area’s total youth funding allocation must be used to provide activities to out-of-school youth (WIA Sec,129 (c)(4)(A)), excluding administrative expenditures (20 CFR 667.210(a)(2)).

3. Adult Program

3.1 Adult Program Requirements

After receiving at least one core service and being determined in need of additional services (intensive and/or training), individuals must meet the following eligibility criteria for the Adult Program:

- U.S. citizen or otherwise legally entitled to work in the U.S.;
- Age 18 or older; and
- Selective Service Registration (males who are 18 or older and born on or after January 1, 1960), unless an exception is justified (see Sec. 5.2 for guidance on Selective Service registration).

NOTE: The criteria above does not reflect low-income or prioritization requirements. Low-income requirements and corresponding prioritization guidelines do not apply unless a local determination of limited funding availability is made (refer to handbook Sec. 3.2).

For an overview of eligibility criteria and documentation requirements refer to handbook Sec. 6.

3.2 Local Determination of Funding Availability

WIA allows WDCs to determine whether or not funding under the Adult program is limited. Since funding is generally limited, each WDC must have a process by which they can determine the availability of funds and establish whether or not funding is limited. This process and the determination must be incorporated in local policy (Policy 1019 Sec. 3.d - Local Responsibilities).

3.3 Priority for Services under the Adult Program

Unless a WDC determines funding is not limited, mandatory priority selection is established and local areas are required to target populations in accordance with 20 CFR 663.600. These targeted populations must first meet the eligibility requirements for the Adult program.

The following matrix describes the order and rationale for the application of the above mentioned prioritization requirements based on the requirements in 20 CFR 663.600 and TEGL 10-09. For purposes of this section, the term “covered person(s)” refers to veterans and eligible spouses in relation to the priority of service for veterans requirements.

Below are the priority requirements when a WDC has determined funding is limited under the Adult program:

Priority	Mandatory Priority Group	Explanation
First	Covered persons (veterans and eligible spouses) who are low-income (may include unemployed individuals) or recipients of public assistance.	Guidelines for serving covered persons (Policy 1009 Rev. 1 – Priority of Service) apply within the mandatory priority criteria of low-income / public assistance recipient.
Second	Individuals (non-covered persons) who are low-income (may include	The mandatory priority criteria (low-income / public assistance) have precedence over

	unemployed individuals) or recipients of public assistance.	covered persons (veterans and eligible spouses) who do not meet the mandatory priority criteria.
Third	Covered persons (veterans and eligible spouses) who <u>are not</u> low-income and <u>are not</u> recipients of public assistance.	Guidelines for serving covered persons (Policy 1009 Rev. 1 – Priority of Service) apply in the third category (individuals who are not low-income / public assistance recipients).
Fourth (optional)	WDCs (in consultation with CLEOs) may establish additional priority groups for subsequent priority for services (Policy 1019 Sec. 3.d – Local Responsibilities).	The mandatory priorities (if funding is limited) established by DOLETA don't prohibit WIA adult services to only the recipients of public assistance and other low income individuals. The WDC and the Governor may establish a process that gives priority for services to other individuals meeting eligibility criteria, as long as the mandatory priority groups are given priority.

NOTE: An adult with a disability can be considered a family of one for low-income determinations (refer to Sec. 5.6.2).

According to 20 CFR 663.600(d), the above priority requirements do not necessarily mean that only the recipients of public assistance and other low-income individuals can receive WIA adult funded intensive and training services when funds are determined to be limited. The WDC may choose to serve other eligible individuals who are not low-income after first serving eligible individuals who meet the established priority selection criteria. Unemployed individuals may be considered low-income individuals (refer to handbook Sec. 5.6.1).

Priority Selection for Intensive Services and Training Services Funded with WIA Statewide (10%) Discretionary Grants/Contracts

The State has determined that funds are not limited for purposes of the WIA Statewide (10%) discretionary funds. The Governor has determined that these funds shall be prioritized in the following order:

1. Eligible veterans and spouses;
2. Unemployed individuals;
3. Low-income individuals;
4. Other Washington job seekers.

As indicated by the first priority above, recipients of Discretionary grants/contracts will continue to provide priority selection of veterans for Intensive and Training Services as required under P.L. 107-288 "Jobs for Veterans Act" and in alignment with WorkSource Policy 1009 Rev 1. In applying this policy to 10% funded projects, veterans who are unemployed and/or low-income, have priority over all other individuals served under these projects.

4. Dislocated Worker Program

4.1 Dislocated Worker Program Requirements

After receiving at least one core service and being determined in need of additional services, individuals must meet the following eligibility guidelines for the Dislocated Worker Program.

- U.S. citizen or otherwise legally entitled to work in the U.S.;
- Selective Service Registration (males who are 18 or older and born on or after January 1, 1960), unless an exception is justified (see Sec. 5.2 for guidance on Selective Service registration). and
- One of the Dislocated Worker categories (see the table below).

NOTE: For an overview of eligibility criteria and documentation requirements refer to handbook Sec. 6.

The following matrix is meant to provide clarity on the requirements within each Dislocated Worker category. Military Service Members (Category 5) and Spouses of Dislocated Military Service Members (Category 6) have been included as individual categories to allow for specificity, although it is commonly understood that these categories fall under the General Dislocation category (1). Refer to handbook Sec. 5.7 for guidance related to the impact of Washington's Marriage Equality Act.

Dislocated Worker Eligibility Criteria			
Category	Criteria		
1. General Dislocation	<input type="checkbox"/>	1.1 An individual who was terminated, laid off, or received a notice of termination or layoff. <u>AND</u>	
	<input type="checkbox"/>	1.2 Is determined unlikely to return to previous industry or occupation (defined by WDCs); <u>AND</u>	
	<input type="checkbox"/>	<input type="checkbox"/> 1.3.1 Is eligible for or has exhausted entitlement to unemployment compensation; <u>OR</u> <input type="checkbox"/> 1.3.2 Is not eligible for unemployment compensation but can show attachment to the workforce.	
2. Dislocation from Facility Closure / Substantial Layoff	<input type="checkbox"/>	2.1 An individual who was terminated, laid off, or received a notice of layoff from employment at a plant, facility, or enterprise as a result of: <ul style="list-style-type: none"> • Permanent closure; or • Substantial layoff; <u>OR</u>	
	<input type="checkbox"/>	2.2 An individual employed at a facility at which the employer has made a general announcement that such facility will close within 180 days.	
3. Self-employed Dislocation	<input type="checkbox"/>	3.1 An individual who was self-employed but is unemployed as a result of: <ul style="list-style-type: none"> • General economic conditions in the WDA where the individual resides; or • A natural disaster. 	
4. Displaced Homemaker	<input type="checkbox"/>	4.1 An individual who was dependent on the income of another family member and is no longer supported by the income of another family member; <u>AND</u>	
	<input type="checkbox"/>	4.2 Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.	
5. Dislocated	<input type="checkbox"/>	5.1 A military service member who was discharged or released from service under conditions	

Military Service Members	<input type="checkbox"/>	other than dishonorable, or has received a notice of military separation (defined by WDC, see Section XX) ; AND
	<input type="checkbox"/>	5.2 Is determined unlikely to return to previous industry or occupation (defined by WDC); AND
	<input type="checkbox"/> <input type="checkbox"/>	5.3 Is eligible for or has exhausted entitlement to Unemployment Insurance; or has had an employment duration that shows attachment to the workforce. Note: Dislocated military service members, veterans and other covered persons are eligible for Priority of Service (POS) as described in POS Policy 1009 Rev 1.
6. Spouses of - Military Service Members	<input type="checkbox"/> <input checked="" type="checkbox"/>	6.1 A military spouse who is unable to continue an employment relationship due to the service member's permanent change of military station; OR 6.2 A military spouse who lost employment as a result of the service member's discharge from the military. Note: a military spouse may also qualify as a displaced homemaker (category 4).

4.2 Serving Military Service Members and their Spouses

4.2.1 Military Service Members (Dislocated Worker – Category 5)

Refer to handbook Sec. 6 for a breakdown of eligibility criteria and documentation requirements.

A military service member who is separated from military service under conditions other than dishonorable, or, who receives a notice of future separation, may be eligible under the WIA Dislocated Worker program based on the “termination” criteria. This may include National Guard or Reserve members who have been discharged from active duty service, but not necessarily from other reserve commitments, such as training.

Veterans and other covered persons determined eligible for the Dislocated Worker program are given priority for services according to the Jobs for Veterans Act and WorkSource (see Policy 1009 Rev. 1 – Priority of Service).

The following serves as an outline of Dislocated Worker eligibility criteria as it applies to military service members:

- Sec. 101(9)(A)(i) - Has been terminated or laid off or received notice of termination or layoff.

[TEGL 22-04](#) states that a discharge from the military under honorable circumstances meets the “termination” criterion. A DD-214 form is the most common documentation used to determine discharge status.

Washington has determined that still-active, transitioning military service members may also qualify for Dislocated Worker services. While these individuals may be *eligible* to receive WIA Dislocated Worker services and funds, they would not be considered ‘veterans’ for the purposes of DOL reporting.

For the purposes of serving still-active transitioning service members under the “notice of termination or layoff” eligibility criterion, documentation must align with the DEV requirement for “Date of Actual Qualifying Dislocation” (refer to handbook Sec. 6).

WDCs must also establish a designated timeframe (prior to planned separation) during which service members can receive Dislocated Worker services (Policy 1019 Sec. 3.d - Local Responsibilities). Length of service to qualify an individual for such discharges or separations under WIA guidance may be as few as one day of service. Qualified individuals can receive services up to eighteen months prior to discharge.

- Sec. 101(9)(A)(ii)(I-II) - Is eligible for unemployment insurance (UI) benefits or has exhausted UI entitlement; or has had an employment duration that shows attachment to the workforce...

Individual circumstances affect whether a returning Military Reserve or National Guard member is eligible for UI benefits. For example, the Uniformed Services Employment and Reemployment Rights Act (USERRA) provides reemployment rights to many veterans who left their civilian jobs to serve. UI state law (RCW 50.04.075) has slight differences in the definition of a dislocated worker, but UI recognizes that a discharge from the military under honorable circumstances meets the “termination” component of state law.

- Sec. 101(9)(A)(iii) - Is unlikely to return to a previous industry or occupation.

Generally, overall work history of a Military Reserve or National Guard member is taken into account, which could include most recent and past industries and occupations. Length of time in the military may also be relevant to make this determination since that would also be the previous industry.

4.2.2 Spouses of Military Service Members (Dislocated Worker - Category 6)

Refer to handbook Sec.6 for an overview of eligibility criteria and documentation requirements.

[TEGL 22-04 Change 1](#) provides clarification and flexibility to serve spouses of military service members (military spouses) under the Dislocated Worker program. DOL affords local areas significant flexibility to serve military spouses. TEGL 22-04 clarifies that the term “military spouse” includes individuals who are married to active duty service members (including National Guard or Reserve personnel on active duty) and surviving spouses of active duty service members who lost their lives while on active duty service in combat-related areas (e.g. Afghanistan or Iraq). Refer to handbook Sec. 5.7 for guidance related to the impact of Washington’s Marriage Equality Act.

When the spouse is unable to continue an employment relationship due to the service member’s permanent change of military station, or the military spouse loses employment as a result of the spouse’s discharge from the military, then the separation from employment meets the termination component of the WIA definition of Dislocated Worker. Eligibility determinations must align with UI policy regarding “good cause” for voluntary quits. Below are two common scenarios that would qualify:

- The spouse of a military service member voluntarily quits because he/she is relocating with the service member to a new duty location.

- The spouse of a military service member is no longer eligible to work on the base as a result of the (military service member's) discharge.

NOTE: Good cause is **not** found when a claimant quits work to relocate someplace other than the military spouse's or domestic partner's new duty location, including relocation to the home of record or elsewhere.

As provided in TEGL 22-04 and TEGL 22-04 Change 1, "termination" of military spouses based on the circumstances described above can be considered to meet the "unlikely to return to a previous industry or occupation" in order to qualify as a dislocated worker. Determination is a matter of judgment based on relevant circumstances, but in most cases, military spouses impacted by a service member's duty reassignment or discharge will meet the "unlikely to return to a previous industry or occupation" criterion of WIA and could be served as dislocated workers.

A military spouse can also be served as Dislocated Worker if he/she meets the definitional requirements for Displaced Homemaker (see definition).

4.3 Eligibility for Employed Individuals, Including "Stop-Gap" Employment

20 CFR 663.220 states that Adults and Dislocated Workers may be eligible for intensive services if they are employed and are determined to be in need of such services to obtain or retain self-sufficient employment. Washington State will use the term "stop-gap employment" when referring to employment that will not lead to self-sufficiency.

WDCs must set criteria (Policy 1019 Sec. 3.d - Local Responsibilities) to determine whether employment leads to self-sufficiency (20 CFR 663.230). The special needs of individuals with disabilities or other barriers to employment should be taken into account when setting criteria to determine self-sufficiency. The following guidance may assist WDCs in establishing this criteria:

- At a minimum, the WDC must use the the lower living standard income level defined at WIA Sec. 101(24);
- WDCs may base the determination on a certain percentage of the wages earned at the time of dislocation; and
- WDCs can include a definition of temporary employment (e.g. duration) and scenarios where temporary employment alone can verify that employment will not lead to self-sufficiency.

Stop-gap employment is temporary work an individual accepts only because they have been laid off from the customary work for which their training, experience or work history qualifies them. Stop-gap employment must be temporary in nature with the intent to end employment upon completion of training, obtaining self-sufficient employment or as specified in the individual employment plan (IEP).

Typically, stop-gap employment will pay less than the individual's wage of self-sufficiency (as defined by the local WDC), however, there may be specific circumstances (determined locally based on local criteria) where stop-gap employment does provide a sufficient wage temporarily but is not considered

permanent employment that leads to self-sufficiency. This stop-gap employment would not change the individual's dislocated worker status if it meets the WDC's criteria.

An otherwise eligible Dislocated Worker remains eligible if either prior to, or during DW program participation, stop-gap employment is obtained for the purpose of income maintenance. If dislocation from a stop-gap position occurs, the job of dislocation remains the original job that established the self-sufficient income. If, at any time, an individual obtains employment that meets the WDCs definition of self-sufficiency, including a scenario where the employment period exceeds WDC established criteria for temporary employment, then that position would be considered the self-sufficient job of dislocation in the event of a future dislocation.

5. Additional Program Guidance

5.1 U.S. Citizenship or Legal Right to Work in the U.S.

As outlined in sections 2.1, 3.1 and 4.1, WDAs are required to verify U.S. citizenship or legal right to work for all WIA Title 1-B programs. Self-attestation is the minimum documentation requirement, but WDCs may choose to require commonly used [I-9 Documentation](#), such as: driver's license / ID card along with Social Security card. Other documentation may only be used to supplement self-attestation or accepted I-9 documentation.

5.2 Selective Service Requirements

To be eligible to receive WIA Title I-funded services, all males born on or after January 1, 1960 must present documentation showing compliance with the Selective Service registration requirements or exceptions, or local areas must determine that the failure to register was not knowing and willful. Complete Selective Service registration requirements and exceptions are found in [TEGL 11-11, Change 2](#), including acceptable documentation to determine registration status and procedures for determining whether or not failure to register was knowing and willful.

Additionally, the [Selective Service System Website](#) provides additional information about registration requirements, including the [Who Must Register Quick Reference Chart](#).

Males 25 Years and Under

Before being enrolled in WIA Title I-funded services, all males who are not registered with the Selective Service and have not reached their 26th birthday must register through the [Selective Service website](#), or provide documentation indicating they are covered by an exception (i.e., serving in the military on full-time active duty or a non-U.S. male on a valid non-immigrant visa). Males turning 18 while participating in WIA Title I-funded services, must complete Selective Service registration no later than 30 days after becoming 18 in order to continue to receive WIA Title I-funded services. Males between 18 and 25 years of age who refuse to register with the Selective Service must be suspended from WIA Title I-funded services until registered.

If a youth has failed to provide verification of Selective Service registration within 30 days of his 18th birthday, services must be suspended (i.e. on the 31st day after his 18th birthday). The WDC must

stop providing services to a participant who has not met the Selective Service registration requirement until the requirement is met.

Males 26 Years and Over

Before enrolling in WIA Title I-funded services, all males, 26 years of age or older, must provide (1) documentation of compliance with the Selective Service registration requirement; (2) documentation showing they were not required to register; or (3) if they were required to register but did not, documentation establishing that their failure to register was not knowing and willful.

Determining Knowing and Willful Failure to Register

[TEGL 11-11, Change 2](#) provides local areas with detailed information about requesting a Status Information Letter and the process for determining knowing and willful failure to register. The intent of the TEGL is to provide a framework for local areas to make determinations through a local process where determinations are based on the individual circumstances (e.g. questions, considerations, statements, status information letter) and relevant documentation (i.e. documentation that supports the reason for not registering or further supports the belief that it was not knowing or willful). Because circumstances will vary and need to be considered, there isn't an established, proven list of acceptable documentation.

5.3 Priority of Service for Veterans and Eligible Spouses

All WIA programs and service delivery must align with federal law, regulations, and guidance on Priority of Service. Priority of service entitles eligible veterans or spouses to enrollment and services before eligible non-covered persons. For additional guidance on Priority of Service refer to WorkSource System Policy 1009 – Priority of Service for Veterans and Eligible Spouses (TEGL 10-09). For specific guidance on priority for services when funding is limited under the Adult program, refer to handbook Sec. 3.2.

5.4 Assisting Victims of Human Trafficking

This guidance is appropriate for one-stop center staff, especially intake workers and frontline staff who may encounter individuals they believe to be possible victims of human trafficking. If an individual is under immediate threat or states that they are in danger, staff should call 911.

On October 24, 2012, the U.S. Department of Labor (DOL), Employment and Training Administration (ETA) released Training and Employment Guidance Letter (TEGL) 9-12. [TEGL 9-12](#) provides additional information and updates earlier guidance on the importance of providing workforce training and referral services to victims of human trafficking. Below are instructions and guidelines for staff.

Recognizing the Characteristics of Victims and Referring Individuals to Proper Authorities and Resources

Many victims of trafficking do not self-identify. A role for staff is to recognize the characteristics of potential victims of trafficking and refer them to the proper authorities and resources. For information on how to identify potential victims of trafficking and a current list of hotlines one-stop staff can call to get help for potential victims, see [TEGL 9-12 Attachments A and B](#).

Providing Employment and Training Services:

U.S. citizens or lawful residents who are victims of trafficking can receive the same services that are provided to the general public under WIA. In addition, under the Traffic Victims Protection Act, certain foreign nationals are also eligible for WIA Title I services. This includes victims of a severe form of trafficking in persons and individuals granted a nonimmigrant “T” visa.

For the purposes of being eligible for WIA Title I services as a victim of a severe form of trafficking:

- Individuals 18 years of age or older must have been subjected to an act or practice described in the definition of “severe forms of trafficking in persons” and have received a letter of certification issued by the Department of Health and Human Services (HHS).
- Children under 18 years old who have been subjected to a severe form of trafficking need not be certified by HHS to be eligible for services; instead, HHS issues Letters of Eligibility to minor victims of trafficking. As with any participant, they must meet all applicable program eligibility requirements to receive WIA Title I services.

Individuals who are granted T visas from the Department of Homeland Security are also eligible for WIA Title I services. The T nonimmigrant Status (T visa) is available to individuals who are or have been victims of human trafficking, and protects these victims of human trafficking by allowing them to remain in the United States to assist in an investigation or prosecution of human trafficking.

Employment and training services should be provided to victims of trafficking to the same extent and following the same procedures and case management processes as for other one-stop customers. However, services to victims of trafficking may need to be tailored and adapted to match the particular needs of this population. For instance, victims of trafficking may have Limited English Proficiency (LEP), criminal records (including from being forced into prostitution), or limited resumes.

Offering Information and Referrals to Other Wraparound Services and/or Law Enforcement

In most cases, victims of trafficking will approach One-stop Centers towards the end of their rehabilitation process and will have already been working with other Federal, state, local or nonprofit organizations and agencies. In the event that the victim has not yet received services, it is important for staff to be aware of and utilize local resources and service providers, particularly non-profit organizations that provide services to trafficking victims. Service providers for trafficking victims can also refer or accompany their clients to the nearest One-stop Center when they are ready for employment and training services.

A description of available services for victims of trafficking offered either directly by Federal agencies or provided by local service providers with funding from the U.S. Government can be found in the document “Services Available to Victims of Human Trafficking: A Resource Guide for Social Service Providers” available at: ["Services Available to Victims of Human Trafficking: A Resource Guide for Social Service Providers"](#) .

Other Inquiries

Questions about DOL guidance should be addressed to ETA Region VI Office at 415-625-7900.

5.5 WIA001 Report and Disallowed Use of UI GUIDE Screen Prints

[WIN 0027 Change 1](#) provides information on the use of the *WIA001 – For WIA Eligibility and Claims Data* report and to further clarify that, effective July 15, 2011, unemployment insurance claim screens (UI GUIDE screen prints) should no longer be used to determine program eligibility.

5.6 Income Verification and Family Size for the Low-Income Criteria

5.6.1 Income Verification:

Utilizing the definition of low-income at Sec. 101(25), WDCs make local determinations regarding income verification and what is included or excluded as income (Policy 1019 Sec. 3.d - Local Responsibilities). [Sec. 8](#) of this handbook provides samples of excludable and includable income. To determine whether an individual is low-income under the definition at WIA Sec. 101(25), it is also necessary to consider family size and family income.

The local definition of “low-income” may include individuals who are unemployed, however, unemployed individuals will not automatically meet the local parameters regarding low-income (i.e., to qualify for the Adult program). The intent is to prioritize services to individuals based on family income (low-income), not to exclude unemployed individuals (who meet the low-income criteria) from receiving services.

5.6.2 Determining Family Size:

For these purposes, “family” under WIA means two or more individuals related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories:

- A married couple, and dependent children;
- A parent or guardian and dependent children; or
- A married couple.

Refer to handbook Sec. 5.7 for guidance related to the impact of Washington’s Marriage Equality Act.

NOTE: Based on 20 CFR 663.640 and 664.250, even if the family of a disabled individual does not meet the income eligibility criteria, the disabled individual may be considered a low-income individual if the their own income meets the income criteria of WIA section 101(25)(A) or 101(25)(B). The disabled individual would be considered a family of one and only the individuals income would be considered when determining low-income.

5.6.3 Defining Dependent:

WIA does not define dependent. To avoid uncertainty in making eligibility decisions regarding family size and income, the state has identified four examples in which a youth must be considered as a dependent (of parent(s) or guardian(s) for the purpose of determining family size for WIA Title I-B Youth and Adult Program eligibility. These four instances are:

Example 1	Youth not yet 18, who are not emancipated youth or runaway youth, living “at home” with their parents or guardians, including individuals in the temporary care of another individual or household (but not claimed as a dependent by that household), e.g.
Example 2	Youth age 18-19 who are full-time students in a secondary school or equivalent, and are living “at home” with their parents or guardians.
Example 3	Youth age 18-21 who are not full-time students, and are living “at home” with their parents or guardians, and who are primarily supported by their parents.

A guardian is a blood relative (e.g., grandparent, aunt or uncle) or another legally recognized relative (e.g., decree of court) who claims the youth as a dependent. The key factors are:

- Relationship by blood or decree of court;
- Living in a single residence; and
- The youth is claimed as a dependent.

WDCs may choose to identify instances in which youth described in Examples 1 and 3 are to be considered individuals and not dependents. Such a definition must be made explicit in local procedures to eliminate any confusion for the purpose of determining family size when making eligibility determinations for the WIA Title I-B Youth and Adult Programs (Policy 1019 Sec. 3.d - Local Responsibilities).

NTOE: WDCs have the authority to develop additional criteria consistent with state and federal guidance to help staff determine family size and income for the purpose of determining WIA Title I-B Youth and Adult Program eligibility (Policy 1019 Sec. 3.d - Local Responsibilities).

5.7 Washington’s Marriage Equality Act

Washington’s Marriage Equality Act ([RCW 26.60](#)) expands the definition of a “married couple” beyond that of a male and female couple. The US Department of Justice will no longer defend the federal “Defense of Marriage Act” as a number of courts have held it is unconstitutional, including the 1st and 2nd Circuit Court of Appeals. Accordingly, in relation to this policy, the state is expanding its definition of a married couple beyond that of a male and a female.

This expanded definition applies to all WIA policy guidance and specifically impacts the following sections within this policy: family size, eligible spouses (Priority of Service), military spouses (Dislocated Worker eligibility), and displaced homemakers (Dislocated Worker eligibility).

6. Eligibility Documentation Requirements

The matrix below provides a comprehensive look at program training eligibility criteria and documentation requirements. The requirements in this matrix outline eligibility criteria and utilize Data Element Validation (DEV) requirements for alignment purposes; however, there are additional DEV requirements beyond the eligibility documentation requirements described in this matrix, including different DEV requirements for core services. For comprehensive information on the Data Reporting and Validation System (DRVS) and Data Element Validation (DEV) requirements, refer to Policy 1003 Revision 1 and TEGL 28-11.

Here are instructions for the eligibility and documentation cross-walk:

Criteria

This column represents all eligibility components for WIA Title 1-B (Youth and Dislocated Worker (DW) categories are listed under criteria, in addition to the components that apply to multiple programs).

Eligibility Requirement

This column includes each program with an indicator in each row if the eligibility criteria applies to the specific program as outlined in Sections 2, 3 and 4 of this handbook.

Documentation Requirement

The corresponding eligibility documentation requirements to the right align with DEV documentation requirements for each eligibility criteria/category. The DRVS number (if the criteria is included under DEV) or other source (if not included under DEV) is listed above each list of documentation.

One document in this column is required for each relevant eligibility criteria/category. Each criteria is connected to one or more potential DRVS lists, but only one document (from the relevant list) is necessary (i.e., low-income and youth category 3 include multiple “options” but only one option is necessary). In addition to the required documentation, WDCs can supplement this requirement by implementing supplemental documentation requirements (Policy 1019 Sec. 3.d - Local Responsibilities).

Self-attestation

The self-attest column serves as a shortcut to indicate whether or not the corresponding documentation list allows for self-attestation.

Criteria	Eligibility Requirement For:					Documentation Requirement	Self-attest
	W-P	Youth		Adult	DW		
		YY	OY				
Citizen / Legally Entitled to Work in the U.S.	N/A	✓	✓	✓	✓	<ul style="list-style-type: none">Self-attestationAccepted I-9 Documentation, such as: driver's license / ID card along with Social Security card. <p>Note: for more information on employment eligibility guidance and alignment with I-9 documentation please see M-274, Instructions for Completing Form I-9.</p>	Yes

Criteria	Eligibility Requirement For:					Documentation Requirement	Self-attest
	W-P	Youth		Adult	DW		
		YY	OY				
Age	N/A	✓	✓	✓	N/A	<u>DRVS 3 - Date of Birth:</u> <ul style="list-style-type: none"> • Driver's license; • Baptismal record; • Birth certificate; • DD-214; • Report of Transfer or Discharge paper; • Federal, state or local ID card; • Passport; • Hospital record of birth; • Public assistance/social service records; • School records or ID cards; • Work permit; • Cross match with Department of Vital Statistics (Department of Health's Center for Health Statistics); or • Tribal records. 	No
Selective Service Registration¹	N/A	N/A	✓ ²	✓	✓	<u>TEGL 11-11 Change 2:</u> <ul style="list-style-type: none"> • Selective Service acknowledgement letter; • Form DD-214 "Report of Separation"; • Screen printout of the Selective Service Verification site; • Selective Service Registration Card; • Selective Service Verification (Form 3A); or • Stamped Post Office Receipt of Registration. 	No
Low-Income³	N/A	✓	✓	✓	N/A	DRVS 20, 21, or 22 for Adult. <u>DRVS 20 - Low Income:</u> <ul style="list-style-type: none"> • Alimony Agreement; • Applicant statement; • Award letter from veteran's administration; • Bank statements; • Compensation award letter; • Court award letter; • Pension statement; • Employer statement/contact; • Family or business financial records; • Housing authority verification; 	Yes (only for 20)

¹ Refer to Sec. 5.2 and TEGL 11-11 Change 2 for additional guidance on determining whether or not failure to register was knowing / willful.

² Selective Service Registration applies to youth who are 18 years of age or older, either at the time of enrollment or during participation. (Refer to Sec. 5.2).

³ Income as an eligibility requirement for the Adult program is determined by the WDC in alignment with Section ii.b of this attachment. Income as an eligibility requirement for youth does not apply to youth enrolled in the 5% window.

Criteria	Eligibility Requirement For:					Documentation Requirement	Self-attest
	W-P	Youth		Adult	DW		
		YY	OY				
						<ul style="list-style-type: none"> • Pay stubs; • Public assistance records; • Quarterly estimated tax for self-employed persons; • Social Security benefits, or • UI documents (WIA001 Report) <p><u>DRVS 21 - TANF:</u></p> <ul style="list-style-type: none"> • Cross- match with TANF public assistance records <p><u>DRVS 22 - Other Public Assistance Recipient:</u></p> <ul style="list-style-type: none"> • Copy of authorization to receive cash public assistance; • Copy of public assistance check; • Medical card showing cash grant status; • Public assistance records; • Refugee assistance records; or • Cross- match with public assistance database. 	
Youth Program		Cat. 1				<p><u>DRVS 31 - Basic literacy skills deficiency:</u></p> <ul style="list-style-type: none"> • Standardized assessment test; • School records; or • Case notes. 	No
		Cat. 2				<p><u>DRVS 30 - School Status at Participation:</u></p> <ul style="list-style-type: none"> • Self- attestation; • Applicable records from education institution (GED certificate, diploma, attendance record, transcripts, drop out letter, school documentation); • WIA intake or registration form; or • State MIS. 	Yes
		Cat. 3	N/A			<p>DRVS 26 (homeless / runaway youth) or DRVS 32 (foster care)</p> <p><u>DRVS 26 - Homeless individual and/or runaway youth:</u></p> <ul style="list-style-type: none"> • Self-attestation; • Written statement from an individual providing residence, shelter or social service agency; or • WIA intake or registration form. <p><u>DRVS 32 - Foster Care Youth:</u></p> <ul style="list-style-type: none"> • Written confirmation from social services 	Yes (only for 26)

Criteria	Eligibility Requirement For:					Documentation Requirement	Self-attest
	W-P	Youth		Adult	DW		
		YY	OY				
						agency, or • Case notes.	
		Cat. 4				<u>DRVS 28 – Pregnant or Parenting Youth:</u> • Self- attestation; • Copy of child’s birth certificate; • Baptismal record; • Observation of pregnancy status; or • Doctor’s note confirming pregnancy.	Yes
		Cat. 5				<u>DRVS 27 - Offender:</u> • Self-attestation; • Documentation from juvenile or adult criminal justice system; • Documented phone call with court or probation representatives; or • WIA intake or registration form.	Yes
		Cat. 6				<u>DRVS 29 - Youth who needs additional assistance:</u> • Self- attestation; • Individual service strategy; • Case notes; • WIA intake or registration form; or • State MIS	Yes
Dislocated Worker Program					Cat. 1	<u>DRVS 25 - Date of Actual Qualifying Dislocation:</u> • Self-attestation; • Verification from employer; • Rapid Response list; • Notice of layoff; or • Public announcement with cross-match with UI (WIA001 Report).	Yes
					Cat. 2	DRVS 25 (refer to list above)	Yes
					Cat. 3	DRVS 25 (refer to list above)	Yes
					Cat. 4	<u>DRVS 24 - Displaced Homemaker:</u> • Self-attestation; • Public assistance records; • Court records; • Divorce Papers; • Bank records; • Spouse’s layoff notice; or • Spouse’s death record.	Yes

Criteria	Eligibility Requirement For:					Documentation Requirement	Self- attest
	W-P	Youth		Adult	DW		
		YY	OY				
					Cat. 5	DRVS 25 ⁴ (refer to list above) or a DD-214	Yes
					Cat. 6	DRVS 25 (refer to list above)	Yes

⁴ Per Section 4.2, transitioning service members may qualify under the Dislocated Worker program even if a DD-214 has not yet been obtained. While these individuals may be *eligible* to receive WIA Dislocated Worker services and funds, they would not be considered 'veterans' for the purposes of DOL reporting.

7. Self-Attestation Forms

You can download the Adult & DW Self-Attestation form [here](#).

WIA Title 1-B Adult & DW Self-Attestation Form

Applicant Information:

Last Name:	First Name:	Middle Initial:
Address:	City:	State:
		Zip:

Individuals entering WIA services may self-attest to the information below:

Are you low-income? (please explain below)

1. **Note: WDCs make local determinations regarding income verification and what is included or excluded as income (Policy 1019 Sec. 3.d - Local Responsibilities).** Yes ☐ No ☐

Explanation:

2. Are you legally entitled to employment within the U.S. and territories? (Adult and DW) Yes ☐ No ☐

3. Have you been terminated, laid off, or received a notice of termination or layoff? (DW Categories 1 and 2) Yes ☐ No ☐

4. Are you a military service member who was discharged or released from service (under conditions other than dishonorable) or has received a notice of military separation? (DW Category 5) Yes ☐ No ☐

5. Were you unable to continue employment due to your spouse's permanent change of military station, or did you lose employment as a result of your spouse's discharge from the military? (DW Category 6) Yes ☐ No ☐

6. Were you self-employed, but are unemployed as a result of general economic conditions in the community in which you reside? (DW Category 3) Yes ☐ No ☐

7. Are you a displaced homemaker? (DW Category 4) Yes ☐ No ☐

Note: A displaced homemaker is an individual who was dependent on the income of another family member and is no longer supported by the income of another family member.

Dislocation Information

Current Employment Information

Date	Separation Date (if known):	Start Date:
Job Title		
Business Name		
Address		
City, State, Zip		

Self-Attestation Statement:

I certify that the information provided on this document is true and accurate to the best of my knowledge and belief. I understand that such information is subject to verification and further understand that the above information, if misrepresented or incomplete, may be grounds for immediate termination from any WIA program and/or penalties as specified by law.

SIGNATURE OF PARTICIPANT**DATE****X****Staff Verification Statement:**

I certify that the individual whose signature appears above provided the information recorded on this form.

SIGNATURE OF STAFF**DATE****X**

You can download this Youth Self-Attestation form [here](#).

WIA Title 1-B Youth Self-Attestation Form			
Applicant Information:			
Last Name:	First Name:	Middle Initial:	
Address:	City:	State:	Zip:
Individuals entering WIA services may self-attest to the information below:			
Are you low-income? (please explain below)			
1. Note: WDCs make local determinations regarding income verification and what is included or excluded as income (Policy 1019 Sec. 3.d - Local Responsibilities).	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Explanation:			
2. Are you legally entitled to employment within the U.S. and territories?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
3. Have you dropped out of school?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
4. Are you homeless or did you run away from home?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
5. Are you pregnant or currently parenting a child?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
6. Are you an offender?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
7. Locally established criteria for "Requires Additional Assistance" may allow for self-attestation (includes individuals with disabilities).	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
8. Are you one or more grade levels below the appropriate grade level for your age? (Only applies to the 5% not meeting the low income criteria)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Self-Attestation Statement:			
<i>I certify that the information provided on this document is true and accurate to the best of my knowledge and belief. I understand that such information is subject to verification and further understand that the above information, if misrepresented or incomplete, may be grounds for immediate termination from any WIA program and/or penalties as specified by law.</i>			
SIGNATURE OF PARTICIPANT		DATE	
X			
Staff Verification Statement:			
<i>I certify that the individual whose signature appears above provided the information recorded on this form.</i>			
SIGNATURE OF STAFF		DATE	
X			

8. Samples of Includable and Excludable Income

The information below is meant to provide WDCs with samples of includable and excludable income to assist with local determinations, not to prescribe a set of includable and excludable income. To maintain flexibility as allowed by WIA, WCDD will not mandate the types of income that should be included or excluded beyond what is prescribed at WIA Sec. 101(25). The information was taken from Indiana, Ohio, and Florida, and the content was re-arranged to better reflect the alignment and gaps between the lists.

Included Income Samples			
	<u>Indiana (2012)</u>	<u>Ohio (Undated)</u>	<u>Florida (2010)</u>
1.	Gross wages and salaries before deductions. Total money earnings received from work performed as an employee. If a family's only source of income was from wages and salary payments, family income would be equal to gross wages and salary received.	Wages and salaries before any deductions, including wages earned while in OJT, on reserve duty in the Armed Forces, and severance pay.	Wages and salaries before any deductions.
2.	Net receipts from non-farm self-employment (receipts from a person's own unincorporated business, professional enterprise, or partnership after deductions for business expenses). If the business or enterprise has suffered a loss, this loss will be allowed to off-set wage earnings.	Net receipts from non-farm self-employment (receipts from a person's own unincorporated business, professional enterprise, or partnership after deductions for business expenses).	Net receipts from self-employment (receipts from an individual's unincorporated business, partnership, or farm which one operates as an owner, renter, or sharecropper, after deductions for business/farm expenses).
3.	Net receipts from farm self-employment (receipts from a farm which one operates as an owner, renter, or sharecropper, after deductions for farm operating expenses). If the farm has suffered a loss, this loss will be allowed to off-set wage earnings.	Net receipts from farm self-employment (receipts from a farm which one operates as an owner, renter, or sharecropper, after deductions for farm operating expenses).	N/A (see #2).
4.	Regular payments from railroad retirement benefits, strike benefits from union funds, worker's compensation, and training stipends.	Regular payments from strike benefits from union funds, worker's compensation, training stipends.	Strike benefits from union funds.
5.	Alimony.	Alimony.	Alimony.
6.	Military family allotments or other regular support from an absent family member or someone not	Military family allotments or regular support (other than child support) from an absent family	Other support from an absent family member not living in the household.

	living in the household, except child support payments and military payments indicated below which are excluded from family income calculations.	member or someone not living in the household.	
7.	Pensions whether private or government employee (including military retirement pay).	Payments from pension and retirement systems including private, government, railroad, and military retirement pay.	Pension or retirement income (including military retirement pay and annuity payments from IRAs, KEOUGHS, 401(k) plans, etc.).
8.	Regular insurance or annuity payments received by the individual or family member.	Regular insurance or annuity payments.	N/A (see #3).
9.	College or university grants or scholarships based on merit, fellowships, and assistantships.	College or university grants, fellowships, and assistantships (other than needs-based scholarships).	Educational Assistance and training stipends (but see excluded income below).
10.	Dividends, interest, net rental income, net royalties, periodic receipts from estates or trusts, and net gambling or lottery winnings.	Dividends and interest, net rental income, or net royalties and/or periodic receipts from estates and trusts.	Net rental income, Interest, dividends, royalties, or periodic receipts from estates, trusts (but see excluded income below).
N/A (see #10).	Net gambling or lottery winnings.	Other miscellaneous sources of revenue considered as reportable income by the IRS (net gambling or lottery winnings, etc.).	N/A (see #10).
11.	On-the-Job Training wages.	N/A	N/A
12.	Social Security Disability (SSDI) Insurance payments (Title II of the Social Security Act, Federal Old-Age, Survivors and Disability Insurance). SSDI pays benefits to individuals that have worked in the past, paid Social Security taxes, and are currently unable to work for a year or more because of a disability. SSDI is considered income replacement.	Regular payments from Social Security Disability Insurance (SSDI).	N/A
Excluded Income Samples			
1.	State and federal unemployment	Unemployment compensation.	Unemployment compensation.

	insurance compensation.		
2.	Regular payments from Old-Age, Survivors, and Disability Insurance (OASI) benefits received under Section 202 of the Social Security Act.	Old age and survivors insurance benefits received under Title II of the Social Security Act	Social security benefits (old age, survivors, disability)
3.	Supplemental Security Income Insurance (SSI), Title XVI of the Social Security Act, for the Aged, Blind, and Disabled. SSI is an income supplement program funded by general tax revenues and pays benefits based on financial need (not Social Security taxes). SSI is designed to help aged, blind, and disabled people who have little or no income and provides cash to meet basic needs for food, clothing, and shelter.	Supplemental Security Income (SSI) from SSA.	Public cash assistance, e.g., TANF, emergency assistance, general relief, supplemental security income (SSI).
4.	Needs-based scholarship assistance, and financial assistance under Title IV of the Higher Education Act, i.e., Pell Grants, Federal Supplemental Educational Opportunity Grants and Federal Work Study, PLUS (Stafford and Perkins loans, like any other kind of loans, are debt and not income).	Needs-Based scholarship assistance, and financial assistance under Title IV of the Higher Education Act (i.e., Pell Grants Federal Supplemental Educational Opportunity Grants and Federal Work Study. Stafford and Perkins loans like any other kind of loan are debt and not income).	Financial aid under Title IV of the Higher Education Act, e.g., PELL Grants, Supplemental Educational Opportunity Grants (SEOG), Federal Work Study, as well as needs-based scholarships.
5.	Child support payments.	Child support payments, including foster care payments and adoption subsidies.	Child support, including foster child payments.
6.	Non-cash benefits such as employer-paid or union-paid portion or health insurance or other employee fringe benefits, Medicare, Medicaid, food stamps, school meals, food or housing received in lieu of wages, and housing assistance.	Non-cash benefits such as employer paid fringe benefits, food or housing received in lieu of wages, Medicare, Medicaid, Food Stamps, school meals, fuel or other housing assistance.	Noncash benefits, e.g., employer-funded insurance, housing, food stamps, housing assistance, school meals, Medicare, Medicaid.
7.	Allowance, earnings, and payments made to individuals participating in WIA programs or any other workforce development program for which eligibility is based upon a needs and/or	Wages earned by WIA participants while in WIA programs (except OJT participants).	Training stipends under WIA except that OJT assistance is included as part of wages and salaries.

	income test.		
8.	Certain one-time cash payments including: tax refunds; one-time gifts; loans, which are debt and not income; assets from the sale of a home, property, or car; one-time insurance settlements; lump sum inheritances; one-time compensation for injury; etc.	Tax refunds, gifts, loans, lump-sum inheritances, onetime insurance payments, or compensation for injury.	Tax refunds, gifts, loans, and other one-time unearned income such as, but not limited to: <ul style="list-style-type: none"> i) payments received for a limited fixed term under income maintenance programs and supplemental (private) unemployment benefits plans; ii) one-time or fixed-term scholarship and fellowship grants; iii) accident, health, and casualty insurance proceeds; iv) disability and death payments, including fixed term (but not lifetime) life insurance annuities and death benefits; v) one-time awards and gifts; vi) inheritance, including fixed term annuities; and vii) fixed-term workers compensation awards.
9.	Capital gains and losses.	Capital gains.	Capital gains
10.	Assets drawn down as withdrawals from a bank and IRA withdrawals.	Any assets drawn down as withdrawals from a bank, sale of property, a house or a car.	Assets drawn down as withdrawals from a bank, sale of property.
11.	Income earned while a veteran was on active military duty and certain other veterans' benefits, i.e., compensation for service-connected disability, family compensation for service-connected death, vocational rehabilitation, and education assistance.	Pay and allowances received under U.S.C. Titles 37 and 38, pay and allowances received while serving on active military duty, compensation for service-connected disability, compensation for service-connected death, vocational rehabilitation, education assistance, and active duty pay for reservists called to active military duty.	Military pay and allowances received by a family member on active duty (includes service while active in the National Guard or Reserves).
12.	Cash welfare payments under a federal, state, or local income-based public assistance program (e.g., Temporary Assistance for Needy Families (TANF), Emergency assistance money payments, Refugee Cash	Cash payments under a Federal, State, or local income based public assistance program such as: <ul style="list-style-type: none"> a. Ohio Works First (OWF) cash payments b. Prevention, Retention & 	N/A

	Assistance (PL 97-212)).	Contingency (PRC) c. Disability Assistance d. Refugee Cash Assistance.	
13.	Cash payments received under Title V of the Older American's Act.	N/A	Wages paid through the Senior Community Service Employment Program funded under Title V of the Older Americans Act.
14.	Payments received under the Trade Readjustment Act of 1974.	N/A	Trade Readjustment Allowances.
15.	Job Corps payments.	N/A	N/A
16.	U. S. Housing and Urban Development (HUD) rental assistance subsidies.	N/A	N/A
17.	Stipends received in the following programs: VISTA, Peace Corps, Foster Grandparent Program, YouthWorks/AmeriCorps Programs, and Retired Senior Volunteer Program.	N/A	N/A
18.	Subsidies for child care made on behalf of a family participating in the child care voucher program administered by the county Step Ahead Council.	N/A	N/A
19.	General Assistance.	N/A	N/A
20.	Foster child care payments.	N/A	N/A
21.	N/A.	N/A.	Periodic receipts from a Supplemental Needs Trust, i.e. a type of special needs trust which complies with provisions of U.S. state and federal law and is designed to provide benefits to, and protect the assets of, physically disabled or mentally disabled persons while still allowing such persons to be qualified for and receive governmental care benefits under SSI, SSDI, and/or Medicaid.
22.	N/A	N/A	Educational benefits for veterans

			and other eligible persons.
23.	N/A	N/A	When a federal statute specifically provides that income or payments received under the statute shall be excluded in determining eligibility for the level of benefits received under any other federal statute, such income or payments shall be excluded in WIA eligibility determination.

9. Eligibility Handbook Questions & Answers (Q&A)

Question	Answer
1. Will WCDD's public comment responses identify whether or not the handbook has been changed based on the public comment and Q&As?	Yes, WCDD will be very transparent about all changes and will provide a rationale and details related to changes.
2. Regarding the statement in the Introduction to the handbook "content is equal to eligibility policy", does this mean the handbook and policy carry the same weight and have equal impact?	Correct. The statement at the beginning of the handbook, "content is equal to eligibility policy" means that they carry the same weight. The handbook represents policy requirements.
3. Why doesn't the content of the policy itself reflect the list of superseded documents?	Language has been added to clarify that the handbook, in addition to the policy, contains relevant guidance that corresponds with the policy's list of superseded documents.
4. For labeling purposes, is RCW 26.60 actually the Marriage Act, or is it instead the law that is now encoded as the result of the act?	RCW 26.60 is actually the RCW covering State Registered Domestic Partnerships, often referred to as the Marriage Equality Act.
5. Are WDCs required to replace all existing eligibility policies with the handbook?	No, WDCs are not required to eliminate local policies. However, local eligibility policies must align and comply with the WIA eligibility policy and handbook. To ensure compliance and maximum alignment with state policy, it is anticipated that WDCs will want to adopt the handbook and include other local policies as appropriate. Another option is to modify/add local policy based on the requirements of the handbook while not actually implementing the handbook in place of existing policy. The intent is for the handbook to serve as a tool.
6. What elements of the self-attestation form ensure that self-attestation is properly documented?	To ensure properly documented customer self-attestation, ESD strongly encourages local areas to use the attached sample self-attestation form or one that is substantially similar in content. The key elements for self-attestation are: (a) a participant (applicant) identifying his or her status for a permitted data element and (b) signing and dating a form attesting to this self-identification (including a disclaimer concerning the self-attestation).
7. If all of the elements on the suggested self-attestation form are already on an area's WIA registration form, including certifying language, can the registration form double as a self-attestation form?	Nothing precludes a local area from using a registration form. However, the local form must include a valid self-attestation statement and clearly identify the specific eligibility components that may be self-attested to, as defined in the eligibility policy, its handbook and TEGl 28-11.
8. Is "applicant statement" under Low-Income (DRVS 20) the same as self-attestation?	Yes, it is. The definition of self-attestation (in the handbook and in TEGl 28-11 – Attachment A) include participant statement in the definition. Participant statement is the same as applicant statement as it is referred to under DRVS 20.
9. Why is Wagner Peyser included on the documentation matrix when all eligibility components say "n/a"?	To illustrate the need to further integrate the two programs and the universal accessibility of Wagner Peyser. The intent of WIA is to provide universal access to certain services prior to intensive or training services under WIA Title 1-B. It is important to recognize universal access under Wagner-Peyser and the intent of TEGls 17-05 and 11-12.

10.	<p>In addition to universal access under Labor Exchange, certain core services (e.g., self-service or informational activities) can be provided universally with WIA Title 1-B funding.</p> <p>What are the universal core services that can be provided by WIA?</p>	<p>The handbook has been modified to reflect the guidance below.</p> <p>20 CFR 663.105(b) states that “Adults and dislocated workers who receive services funded under title I other than self-service or informational activities must be registered and determined eligible.”</p> <p>The types of services that can be provided without enrolling the individual are described at 664.140(2): “Self-service and informational activities are those core services that are made available and accessible to the general public, that are designed to inform and educate individuals about the labor market and their employment strengths, weaknesses, and the range of services appropriate to their situation, and that do not require significant staff involvement with the individual in terms of resources or time.”</p> <p>TEGL 17-05 clarifies that “significant staff involvement” includes staff’s assessment of a participant’s skills, education or career objectives to assist the participant in making a decision or accessing information, compared to staff providing a participant with <u>readily available information</u> that does not require an assessment.</p>
11.	<p>Is it the expectation that if WIA 1-B funds core services then the individual must be enrolled in the WIA 1-B program?</p>	<p>Yes, if WIA 1-B funds a core service, beyond self-service or informational activities, the individual should be enrolled in a WIA 1-B program (20 CFR 663.105 and TEGLs 17-05 and 11-12).</p>
12.	<p>What happens when a male youth who is enrolled prior to their 18th birthday turns 18 while enrolled?</p>	<p>If a youth has failed to provide verification of Selective Service registration within 30 days of his 18th birthday, services must be suspended (i.e. on the 31st day after his 18th birthday).</p>
13.	<p>What is the definition of “suspended” as it relates to Selective Service registration?</p>	<p>Suspended means that the WDC must stop providing services to a participant who has not met the Selective Service registration requirement until the requirement is met. WIA does not attach a timeframe to the suspension, likely due to the various circumstances and processing delays that can impact the registration process.</p> <p>The intent of TEGL 11-11 Change 2 is to allow youth to provide documentation of registration submission or completed registration. DOL provided clarification that the “Screen printout of the <u>Selective Service Verification site</u>” described in the TEGL can also be a screen print of the successful online registration. This is in addition to the option to use documentation that verifies the registration has been completed (i.e. acknowledgement letter, registration card, or screen printout of the Selective Service verification site).</p>
14.	<p>What is the definition of “family” under WIA (i.e. registered or non-registered partnerships)?</p>	<p>Family is clearly defined by WIA at Sec. 101(15). The language in the handbook reflects this definition, tying it to relationship by blood, marriage, or decree of court. To meet the intent of Washington’s Marriage Equality Act, WCDD clarified in the handbook that the state is expanding its definition of a married couple beyond that of a male and a female, however, this expansion only applies to marriage or decree of court as outlined in WIA Sec. 101(15). Other (non-documented or non-registered) partnerships are not recognized by Washington state as equal to marriage and therefore do not meet the definition of marriage as it is addressed at WIA Sec. 101(15).</p>
15.	<p>How should family size be interpreted for youth living with relatives other than their parents, and what is the definition of guardian?</p>	<p>The definition of family (for determining family size) at WIA Sec. 101(15) clearly sets the parameters of “two or more persons related by blood, marriage, or decree of court, who are living in a single residence...” The inclusion of “a parent or guardian and dependent children” falls within the</p>

		<p>parameters of relationship by blood, marriage, or decree of court (living in single residence).</p> <p>A guardian can be a blood relative (e.g., grandparent, aunt or uncle) or another legally recognized relative (e.g., decree of court) who claims the youth as a dependent. The key factors are: 1) relationship by blood or decree of court, 2) living in a single residence, and 3) the youth is claimed as a dependent. The handbook has been modified to reflect this clarification.</p>
16.	Is “couch surfing” included under the category of homeless youth? Does the category of “runaway” youth hold any significance on this topic?	<p>Included in the definition of “homeless” at 42 USC Sec. 11302 and TEGL 28-11 Attachment A is the following category (emphasis added): “an individual or family who lacks a fixed, <u>regular</u>, and adequate nighttime residence.”</p> <p>Based on the definition of “homeless” (including the category above), staff should evaluate the circumstances and make a case-by-case determination as to the regularity and adequacy of the accommodations. “Couch surfing” is not likely to meet the condition of <u>regular</u> nighttime residence and would likely establish and individual as homeless for the purpose of WIA 1-B Youth eligibility.</p> <p>The “runaway” category provides additional flexibility outside of the definition of “homeless” and local areas should consider guidance in TEGL 28-11 Attachment A when determining if a non-homeless individual should be categorized as a runaway youth. TEGL 28-11 states that “a person under 18 years of age who absents himself or herself from home or place of legal residence without the permission of his or her family” is considered a runaway youth.</p> <p>TEGL 28-11 Attachment A clarifies that “an individual who may be sleeping in a temporary accommodation while away from home should not, as a result of that alone, be recorded as homeless.”</p>
17.	Can a youth self-attest to having a disability?	<p>Yes, a youth can self-attest to needing additional assistance (DRVS 29), including a youth with a disability (20 CFR 664.200(6)).</p> <p>In the same way, DRVS 20 for low-income allows for self-attestation of low-income status, including individuals with disabilities whose own incomes meet the income requirements.</p>
18.	If disabled, can a youth be considered a family of one for determining level of income? Does the same apply for a disabled adult?	<p>Yes, based on WIA Sec. 101(25)(F) and 20 CFR 663.640 and 664.250, even if the family of a disabled individual does not meet the income eligibility criteria, the disabled individual may be considered a low-income individual if the individual’s own income meets the income criteria of WIA section 101(25)(A) or 101(25)(B). Language has been added (under Youth and Adult) to clarify low-income guidance at Sec. 101(25), including guidance pertaining to individuals with disabilities who qualify as a family of one.</p>
19.	Regarding family income, can WCDD provide local areas with guidelines on includable and excludable income, similar to what is provided by other states?	<p>To maintain flexibility as allowed by WIA, WCDD will not mandate the types of income that should be included by local areas beyond what is prescribed at WIA Sec. 101(25). WCDD has included in the handbook samples or options to assist local areas in making this determination.</p>
20.	The handbook indicates that each WDC “must ... establish whether or not funding is limited”. Since funding has always been limited and a shift is not anticipated in the foreseeable future, why not write this to say	<p>The language in the policy and handbook is intended to align with the regulations which allow local areas to establish whether or not funding is limited. WCDD does not want to imply a statewide determination. Although this policy does not require WDCs to re-evaluate the existing determination, the language is intentional to ensure WDCs have a documented decision and process for making this decision, consistent with 663.600(b).</p>

	“should funds become unlimited, WDCs will need a written process”?	
21.	The first adult priority group includes “Unemployed, low-income or recipients of public assistance.” Can the adult program serve unemployed adults or only employed adults who are either low-income or who meet other WDC established income criteria?	Yes, the Adult program can serve unemployed adults, even if funding is limited. The language in the handbook has been modified to indicate that the local definition of “low-income” <u>may</u> include individuals who are unemployed, however, unemployed individuals will not automatically meet the local parameters regarding low-income. The intent is to prioritize services to individuals based on family income (low-income), not to exclude unemployed individuals (who meet the low-income criteria) from receiving services.
22.	The state deleted the priority designated by the Governor for income at 175% of Poverty Guidelines, plus one barrier to employment. Do local policies need to remove this as well?	It can be removed from local policy. Although it is no longer a state mandated priority, local areas can establish additional priority requirements beyond the mandated requirements.
23.	Under the scenarios for determining dependent status it states “Youth not yet 18, who are not emancipated youth or runaway youth, who do not live “at home” with their parents or guardians.” This is confusing, where would the youth be currently living? Does this include homeless youth under 18? If so how do we determine/document the difference between runaway and homelessness?	The handbook has been modified as follows: <i>Example 1: Youth not yet 18, who are not emancipated youth or runaway youth, living “at home” with their parents or guardians, <u>including individuals in the temporary care of another individual or household (but not claimed as a dependent by that household).</u></i> The intent is to acknowledge that certain youth are not living at home but are still dependents because they are not emancipated or runaway youth. For example, a youth could be at a boarding school or in temporary residential care but not claimed as a dependent by that household (also refer to Question #15). Homeless youth and runaway youth are both classified and documented under the same Data Element (TEGL 28-11, Attachment A). Refer to DRVS #26.
24.	Does a parent or guardian need to sign the Youth self-attestation form if the youth is under 18?	No, the self-attestation definition in TEGL 28-11 only requires a signature from the participant. In addition, certain youth (e.g. homeless or runaway) may not be able to obtain a parent’s or guardian’s signature. Consistent with the documentation requirements of TEGL 28-11, all youth categories allow for self-attestation (including homeless / runaway).
25.	Why did the state remove the dislocated worker age requirement? Doesn't 20 CFR 663.110 indicate that an individual must be at least 18 years of age to be eligible to receive core services as an adult in the adult and dislocated worker programs?	DOL Region 6 recently confirmed that there is no age requirement for the Dislocated Worker program in WIA law or regulations. As indicated by the header of Sec. 663.110, this section specifically addresses <u>adults</u> under WIA who are potentially eligible under the Adult or Dislocated Worker programs. Sec. 663.115 speaks of <u>dislocated workers</u> under WIA who are potentially eligible under the Adult or Dislocated Worker programs. A distinction is made between adults in the Dislocated Worker program (663.110) and other individuals (dislocated workers) in the Dislocated Worker program (663.115), implying that other (non-adult) dislocated workers can qualify under the Dislocated Worker program.
26.	Does 1.3.1 of Dislocated Worker Category 1 imply that Unemployment Insurance eligibility is not a required component for Dislocated Worker eligibility if an individual can show attachment to the workforce?	Correct. The definition of Dislocated Worker at WIA Sec. 101(9) clearly states that one of the two is required: eligibility for Unemployment Insurance or demonstrated attachment to the workforce. This proof of “attachment” or employment can likely be found in the same documentation used to verify dislocation (DRVS 25 Date of Actual Qualifying Dislocation).

27.	Is there a work-around to determine if individuals are/were seasonal workers since the WIA 001 report does not specify if employment was seasonal? How can local areas determine the cause of separation (i.e. lack of work/layoff vs. a quit)?	The WIA 001 report does not provide information on type of employment (e.g. seasonal). The cause of separation is not necessary to determine eligibility. The dislocated worker program requires separation from employment but the definition at WIA Sec. 101(9) includes individuals who are terminated, laid off, or who received a notice of termination or layoff. These terms are not defined any further. The fact that WIA only requires that the dislocated individual can show attachment to the workforce (if they are not eligible for UI benefits) confirms that the reason for the separation is not relevant.
28.	How is a future layoff date recorded in SKIES, both for an unknown separation date and a known/anticipated separation date? How does this apply to transitioning military service members?	<p>The date of dislocation is based on the qualifying documentation as outlined in TEGL 28-11, Attachment A. Qualifying dislocations can be tied to past or future separation. If the documentation does not specify a known separation date (past or impending), the date of the document itself should be entered as the layoff date. The document itself (even if separation has not yet occurred) allows for enrollment.</p> <p>Transitioning military service members are treated as Category 1 Dislocated Workers according to TEGL 22-04. The same documentation requirements apply to transitioning military service members (DRVS #25) with the inclusion of the DD-214 as an option for eligibility documentation. Again, if the documentation used does not provide a separation date or anticipated separation date, the actual date of the document itself would establish the qualifying "dislocation" date.</p>
29.	The policy's local responsibilities section mentions "employment that leads to self-sufficiency." Should "stop-gap" be added or mentioned in this section?	To better align the policy language with the language in the handbook, WCDD added the term "stop-gap" to this section. This should clarify that the local responsibility regarding the definition of "employment that leads to self-sufficiency" corresponds with the handbook's guidance on "stop-gap" employment, and that "stop-gap" employment is commonly used to describe non-sufficient employment.
30.	Do WorkSource Centers certify that people they refer for employment are legally entitled to work in the U.S.?	Some state workforce agencies verify employment eligibility through the use of Form I-9 (or something like it), but Washington does not. Self-attestation is allowable for WIA Title 1-B eligibility determinations, and individuals referred to employment only have to attest to legal entitlement to work (during SKIES registration). The matrix can be modified to add supplemental documentation requirements if a WDC is not comfortable allowing self-attestation for legally entitled to employment in the U.S.
31.	Is the language "spouses of dislocated military service members" under Dislocated Worker Category #6 accurate? TEGL 22-04 does not indicate that the military service member must be dislocated.	The word "dislocated" has been removed. WCDD agrees that TEGL 22-04 and Change 1 do not limit eligibility to the spouse of a dislocated military service member.

32.	TEGL 22-04 indicates that the military spouse must be married to an <u>active</u> duty service member. Is the second scenario under the “Spouses of Military Service Members” section accurate? If the military service member was discharged; they are no longer active duty.	<p>Section 5 of TEGL 22-04 states that if “the military spouse loses employment as a result of the spouse’s discharge from the military, then the cessation of employment can be considered to meet the termination component.” In addition, TEGL 22-04 Change 1 states (emphasis added) that the “spouse’s cessation of employment, due to the service member’s permanent change of military station <u>or his/her discharge</u> from the military, can also be considered to meet the “unlikely to return to a previous industry or occupation” criterion of the WIA definition of dislocated worker outlined in Section 101(9)(A)(iii).</p> <p>Based on the language in the TEGL, WCDD has made the determination that the original definition in TEGL 22-04 does not supersede subsequent guidance. This definition was likely intended to define a qualifying marriage relationship without providing further information on qualifying circumstances and timeframes.</p>
33.	Should complaint & grievance requirements be mentioned in the policy or handbook?	Sec. 667.600 requires all participants receiving Title-I funded services to be provided with information about the content of local complaint and grievance procedures. Such information, however, is not a required component of the eligibility policy itself.
34.	Would it be appropriate to add a statement in the Policy or Handbook regarding data privacy and security?	WCDD has added a reference to data privacy and security, including a link to policy 3415 Revision 1 and RCW 50.13.
35.	Regarding reference to DRVS #21 for low-income: Should TANF appear under Youth program, or can TANF only be used for low-income verification under the Adult program?	Yes, it should also appear under the Youth program. TEGL 28-11 (Attachment A) indicates that TANF can also validate for older youth (OY) and younger youth (YY). This change has been applied to the handbook.
36.	Can local areas make changes to the documentation matrix in the handbook, i.e., if a WDC decides not to allow Self-Attestation for “legally entitled to work”?	The matrix can be modified to add <u>supplemental</u> documentation requirements (i.e. if a WDC is not comfortable allowing self-attestation for legally entitled to employment in the U.S.). However, the documentation listed identifies the minimum state/federal documentation requirements and one document from the state’s list must be obtained for each applicable eligibility component.